

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
Jackson DIVISION**

NICOL JACKSON,
Plaintiff,
V.
Kingdom Hall Of Jehovah Witnesses, et, al.,
Defendants

Civil Action #: 22-1133

Presiding Judge: Chief Judge Anderson

Magistrate Judge York

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Plaintiff's Response to o Defendant's Motion to Dismiss.

**Wendy R Oliver, Clerk
U.S. District Court
W.D. OF TN, Jackson**

My original complaint includes Slander and Sexual Assault. My **Amended Complaint** date: **4/11/2022**

My original Demand was sent March 2021 but as after as I spoke to P.L. The General Council. I sent my case to Middle TN accusong the JW of Slander and Sexual Assault. I filed my case with the courts that was 4-6 months after finding out they lied and covered up my sexual assault. The accuracy of all this is the simple fact that my entire family, paternal and maternal knew i had been assaulted for years and my abuser/rapist had been punished., we BECAUSE were told he was prosecuted and disfellowshipped, we accepted that as punishment, me included. My mother wanted to kill him, that accident happened.. . In March 2021, all that I knew to be true and all that I had to divulge to my family makes me look like a liar because once again im having to ask them to maybe help me prove he sexually assaulted me. Now I'm back to trying to get some justice from from JW protocol. I might need them again to testify and it makes me look like I lied to what I admitted to. Yes my reputation is screwed because after finding out once again he was able to assault me with no repercussions I do look like a liar. You got my family doubting me because I had to let them know I might need them again, if need be.

Pierre lamareux stated to me in March of 2021 that no one in tthe JW chain of command did anything in regards to me being raped and molested and sexually assaunlted. I filed my case in court 4 months after Pierre Lamoureux uttered Slanderous words at me " we did nothing" "we let him repent" because the last thing i was informed of and my mother, my sisters and my God father was informed of was, he went to jail and was disfellowshipped.

I spoke to Pierre Lamareaux after leaving 3-4 messages on the Answering Machine. I spoke to him after i spoke to General Council, Pierre Lamareaux is the one who i spoke to in March 2021, I filed my demand March 2021 probably same day I spoke to P.L and he told me Slanderous words "We did nothing, we let him repent". I filed my case in August 2021 with the courts. That's 5 months.

As I stated prior, I filed my case against people that were aware and covered up my abuse with slander and allowed me to be sexually assaulted for years. I didn't find this out until their Council followed up with a call and I followed up with a call to Pierre Lamareaux in 2021 and he let me know that they did nothing. I thought they had him arrested and disfellowshipped, I thought he went to jail, so yes I would like to know where those Individual Elders that I named reside now and in 2021. Because if they or any one of them reside anywhere near where I will have grounds to transfer my case back to Middle Tennessee I would like to transfer my case back to Middle Tennessee. Therefore, the defendants should be made to divulge the information I am requesting as to where those elders reside now and then and yes, then because that's why I am trying to sue now because they allowed me to be hurt. .

I ask the court to ask the defendants to release the true information to me. And my case should not be dismissed out of Western Tennessee but transferred back if any of the defendants reside in middle tn and or did then.

I am on a fixed income from the PTSD i suffer from the years of Mental, Sexual, Physical, emotional abuse I had to suffer at the hands and protocol of these Jehovah's Witnesses who saw fit to let a sexual deviant pedophile to assault me for years.

I asked where Robert Ciranko and Hernan Steele, who submitted the declarations that they had "some" information in regards to my "case", ask the court to submit to how? Who are they? What do they know and what information do they have?" Where did these 2 individuals live and what part did they play in either the cover up of my assaults or where they resided at the time of the information they have and where they reside now?

I ask the court to please request the defendants to answer the above questions before dismissal of my case.

In response to Defendant's response about my not opposing a transfer: "I didn't know you all were going to suggest a transfer to western tennessee to get my case dismissed. That's not equally fair. I knew I had a right to file my case after I spoke with Pierre Lamaoreaux and the General Council in 2021, that's when they let me know they committed a crime against me. I thought from reading the papers that it was more convenient to carry on my case from Western Tn. I got bamboozled on this one.

In any scenario, I ask that my case not be dismissed with prejudice. Pretty soon a bill will pass that will take the statute of limitations off the table for people who have been sexually assaulted, molested. There will be a bill passed that will not allow sexual predators to get off the hook by time and a day. Its coming. I ask the court to please not dismiss my case with prejudice.

Nicol Jackson, PLEASE ACCEPT THIS IS MY SIGNATURE.

I hereby certify I have mailed a copy of this response to the Defendants and the Western TN Court. I will email the defendants a copy of the above. I am not yet granted access to the CMECF System.

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